

Brian K. Reinbold Sr.

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April 16, 2006

*Judge Gregory M. Sleet
United States District Court
844 N. King Street
Wilmington, DE 19801-3570*

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
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*Re: Brian K Reinbold vs. NALC 191 & USPS
US District Court Case # 05-047 (GMS)*

Dear Judge Sleet:

Please find enclosed my request for you to reconsider your order dated April 10, 2006 and reopen the case and schedule it for a jury trial.

Sincerely,


Brian K Reinbold

Hand delivered to court

Cc:

*Sent via certified mail # 7004 1160 0006 3104 1161 w/ return receipt To
Oriana Vigliotti c/o Cohen, Weiss & Simon LLP*

*Sent via certified mail #7004 1160 0006 3104 1260 w/return receipt
Patricia Hannigan US Attorney General
file*

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD
Plaintiff,

vs.

Civil Action Number
05-047 GMS

NALC BRANCH 191 & USPS
Defendant

**MOTION FOR RECONSIDER ORDER
AND SCHEDULE FOR JURY TRIAL**

On April 10, 2006 the court ruled on a Motion for Summary Judgment filed by the USPS, in it's order the court states that I the plaintiff never responded to the motion filed by the USPS and have not submitted any arguments to support my claims when I filed the case. The NALC filed a Motion to Dismiss for Failure for Lack of Prosecution which the court denied.

Arguments in Support:

On July 26, 2005 I the plaintiff sent a response to attorneys for NALC 1977 & NALC 191 for there Request for Interrogatories and Documents dated June 29, 2005 and was received by them on July 28, 2005.

SEE EXHIBIT 1/1A/1B/1C/Doc I

On July 26, 2005 I the plaintiff sent a copy of my response to attorney for USPS for the Request for Interrogatories and Documents dated June 29, 2005 by NALC 1977 & NALC 191 and was received by them on July 29, 2005.

SEE EXHIBIT 1/1A/1B/1C/Doc I

On September 6, 2005 I the plaintiff sent a copy of my requests for Interrogatories and Documents dated September 5, 2005 to attorney for USPS and was received by them on September 8, 2005.

SEE EXHIBIT 2/2A/2B/2C/2D

On September 6, 2005 I the plaintiff sent a copy of my requests for Interrogatories and Documents dated September 5, 2005 to attorney for NALC 1977 & NALC 191 and was received by them on September 8, 2005.

SEE EXHIBIT 2/2A/2B/2C/2D

I still have not received a response from either defendants for my request for Interrogatories and Documents.

The last correspondents I received from the attorneys for NALC 1977 & NALC 191
Was there Motion to Dismiss for Failure to Answer there Interrogatories and
Documents Request.

The last correspondents I received from the attorneys for USPS
was there Documents for Disclosure.

I have never received a Motion to Dismiss from the USPS.

The USPS has filed documents stating that the NALC 191 had not filed statements
to the Step B Team in my support for or against me in my grievance.

SEE Exhibit 3/3 p2 Sec 4 / 3 pg 4 BB/3C

The USPS has filed documents stating that the NALC 191 knew and believed that
the USPS was harassing me and nothing was done.

SEE Exhibit 3 page 2 sec 4/3A sec 2


The USPS has filed documents stating that I violated the SOP and then contends I
followed it at the same time.

SEE Exhibit 4 pg 3 Sec 15

CLOSING:

I believe the records and documents filed by USPS show that the NALC 191 &
USPS were in violation of the CBA and there own agreements and disregarded any
rules or guidelines so they could remove me from the post office.

I ask that the court reconsider the order filed on April 10, 2006
And reopen the case and schedule for a jury trial at it's earliest time or schedule a
conference were the claims can be proven.


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